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August 31, 2022

**By ECF:**

Magistrate Judge Peggy Kuo  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East, Courtroom 11C South  
Brooklyn, New York 11201

**Re: Rosenfeld v. AC2T, Inc., No. 1:20-cv-04662-FB-PK (E.D.N.Y.)**

Dear Judge Kuo:

My firm represents Plaintiff in the above-captioned action. Together with Defendant AC2T, Inc., and in accordance with Rule IV of Your Honor's Individual Rules, we write to respectfully request an extension of the current Scheduling Order. The parties have worked cooperatively throughout the discovery process and have recently completed nearly all, if not all of the document production. The parties are currently in the process of scheduling party and third-party depositions. However, this does not leave sufficient time for the parties to brief class certification based on the current record. We aim to complete the schedule for upcoming depositions in the coming week and anticipate that we can provide the court with a proposal for a revised scheduling order shortly thereafter.

Therefore, the parties jointly request that the Court take the current scheduling order off calendar and direct the parties to submit an updated scheduling order by no later than September 9, 2022.

This is the parties' third request to amend the Scheduling Order. We appreciate the Court's consideration to this matter. If Your Honor has any questions or concerns, we can be available at the Court's convenience.

Very truly yours,

A handwritten signature in blue ink that reads 'Y. Kopel'. The signature is written over a faint, circular, textured background.

Yitzchak Kopel

CC: All counsel of record (via ECF)